

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**CHAD HAYSE,**

Plaintiff,

vs.

Case No: 17-cv-13294

Hon. Linda V. Parker

Mag. Elizabeth A. Stafford

**CITY OF MELVINDALE**, *a political  
Subdivision of the State*; **MELVINDALE  
CITY COUNCIL**, *a legislative body of the  
City of Melvindale*; **NICOLE BARNES,  
WHEELER MARSEE, MICHELLE SAID  
LAND, DAVE CYBULSKI, CARL  
LOUVET, and STEVEN DENSMORE,**  
*individuals, sued in their official and  
personal capacities,*

Defendants.

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**DEBORAH GORDON LAW**

Deborah L. Gordon (P27058)  
Benjamin I. Shipper (P77558)  
Irina L. Vaynerman (0396759)  
Elizabeth Marzotto Taylor (P82061)  
Attorneys for Plaintiff  
33 Bloomfield Hills Parkway, Suite 220  
Bloomfield Hills, Michigan 48304  
(248) 258-2500/Fax (248) 258-7881  
dgordon@deborahgordonlaw.com  
bshipper@deborahgordonlaw.com  
ivaynerman@deborahgordonlaw.com  
emarzottotaylor@deborahgordonlaw.com

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**FOLEY & MANSFIELD, PLLP**

Gregory M. Meihn (P38939)  
Melinda Balian (P55744)  
Attorneys for Defendants  
130 E. Nine Mile Road  
Ferndale, Michigan 48220  
(248) 721-8183/Fax (248) 721-4201  
gmeihn@foleymansfield.com  
mbalian@foleymansfield.com

Lawrence J. Coogan (P42433)  
Co-Counsel for Defendants  
4146 Oakwood Blvd.  
Melvindale, Michigan 48122  
(313) 381-0044  
lawrencejcooganlaw@yahoo.com

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**PLAINTIFF'S MOTION TO AMEND REPLY TO ADD CITATIONS TO  
TRANSCRIPT OF DEPOSITION OF MATTHEW FURMAN**

NOW COMES Plaintiff Chad Hayse, by and through his attorneys, Deborah Gordon Law, and for his Motion to Amend Plaintiff's Reply to Defendants' Response to Plaintiff's Motion to Compel Defendants' Responses to Plaintiff's First Set of Interrogatories and Requests to Produce to Add Citations to the Transcript of Matthew Furman, and states as follows:

1. This is an action by Plaintiff Chad Hayse against Defendants City of Melvindale, Melvindale City Council, and City Council Members for depriving him of his Fourteenth Amendment due process rights under the United States Constitution.

2. Plaintiff, formerly the City of Melvindale's Chief of Police, filed this lawsuit on October 6, 2017 (Dkt. #1).

3. This Motion is brought under Fed. R. Civ. P. 15(a)(1)(A) and Local Rule 15.1 to request the Court's leave to amend Plaintiff's Reply to Defendants' Response to Plaintiff's Motion to Compel Defendants' Responses to Plaintiff's First Set of Interrogatories and Requests to Produce to add citations to the deposition transcript of Matthew Furman.

4. Plaintiff's Reply was filed on the due-date of March 15, 2018 (Dkt. #44).

5. The deposition of Melvindale Police Sergeant Matthew Furman was conducted on March 13, 2018, but the deposition transcript was not completed until March 15, 2018.

6. In order to set forth a full and timely Reply, Plaintiff cited to the then-incomplete transcript of Plaintiff's deposition of Matthew Furman on pages 2 and 4 of Plaintiff's Reply (Dkt. #44 at 2, 4).

7. The deposition transcript of Matthew Furman having now been received, Plaintiff seeks leave to amend his Reply to add citations to the record as follows:

- a. Dkt. #44 at 2 n.2: **Ex. W**, Furman Dep. at 78: 23-24; 79: 2-13.
- b. Dkt. #44 at 4 n.4: **Ex. W**, Furman Dep. at 66: 6-16; 67: 4-5; 279:13-16; 280: 9-14.

8. The Amended Reply is attached to this Motion as **Exhibit A**.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order granting Plaintiff leave to amend his Reply to Defendants' Response to Plaintiff's Motion to Compel Defendants' Responses to Plaintiff's First Set of Interrogatories and Requests to Produce.

Dated: March 20, 2018

**DEBORAH GORDON LAW**

/s/ Elizabeth Marzotto Taylor (P82061)

Deborah L. Gordon (P27058)

Irina L. Vaynerman 0396759)

Benjamin I. Shipper (P77558)

Attorneys for Plaintiff

33 Bloomfield Hills Parkway, Suite 220

Bloomfield Hills, Michigan 48304

(248) 258-2500

dgordon@deborahgordonlaw.com

bshipper@deborahgordonlaw.com

ivaynerman@deborahgordonlaw.com

emarzottotaylor@deborahgordonlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2018 I electronically filed with the foregoing Motion, & Exhibits with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

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/s/Elizabeth Marzotto Taylor (P82061)

Attorneys for Plaintiff

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Bloomfield Hills, Michigan 48304